

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

CHARLESTON DIVISION

2:15-cr-472-RMG

United States of America,

vs.

Dylann Storm Roof

**EX PARTE MOTION FOR A SUBPOENA *DUCES TECUM* AND FOR THE PRE-TRIAL
PRODUCTION OF DOCUMENTS PURSUANT TO FEDERAL RULES OF CRIMINAL
PROCEDURE RULE 17(b) & 17(c)**

Comes now the defendant through his undersigned attorneys who ask this Court to issue a subpoena *duces tecum* to Lt. Fletcher King, Security Threat Unit, Sheriff J. Al Cannon Charleston County Detention Center to appear in the United States District Court for the District of South Carolina, Charleston Division at a time to be determined and to bring with him the following documents:

1. Any and all letters, notes, e-mails, text messages, facsimiles, and writings produced as a result of verbal conversations between any employee of the Charleston County Sheriff's Office regarding Dylann Roof, including but not limited to employees at the Al Cannon Detention Center, The Sheriff's Administrative Offices, the Sheriff's Law Enforcement Division, the Intelligence Group at the Al Cannon Detention Center, and The Security Threat Group and

- a. Federal Bureau of Investigation Agents;
- b. State Law Enforcement Division Agents;
- c. Employees of the City of Charleston Police Department Charleston City Police Department;
- d. Any and all employees at The Ninth Circuit Solicitor's Office including Solicitor Scarlett A. Wilson;

The defendant also asks this Court to issue an Order which requires Lt. Fletcher King to make copies of the above documents and provide them to his attorney or his attorney's representative within ten (10) days of service of the subpoena *duces tecum*.

The defendant is indigent and he asks this Court to exempt him from paying travel expenses and the witness fee to Lt. King.

Respectfully Submitted,

S/MICHAEL P. O'CONNELL
Michael P. O'Connell, Esq.
PO Box 828
Mt. Pleasant, SC 29464
Federal Court ID. 2915
843-577-9890 telephone
843-577-9826 facsimile
moconnell@stirlingoconnell.com

David I. Bruck, Esq.
Washington & Lee Law School
Sydney Lewis Hall
Lexington, VA 24450-0303
540-460-8178 telephone
bruckd@wlu.edu

November 2, 2015